

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PETER ST. LAURENT,  
Plaintiff

v.

UNITED PARCEL SERVICE,  
Defendant

FOR DEPOSIT  
CIVIL ACTION NO. 04-CV-11951-FDS

**STATEMENT PURSUANT TO LOCAL RULE 16.1(D)**

The Plaintiff, Peter St. Laurent, state that he conferred with the Defendant, through counsel, in this matter and Mr. St. Laurent hereby submits a Statement Pursuant to Local Rule 16.1(D). While the parties agree on the dates proposed, the Defendant submitted its own Statement, and thus the Plaintiff is also submitting a statement with matching dates.

A. Proposed Pre-Trial Schedule


- |   |                   |
|---|-------------------|
| 1. Initial disclosures by:                                  | December 2, 2004  |
| 2. Amendments to pleadings to add parties by:               | December 15, 2004 |
| 3. Completion of written discovery and fact depositions by: | April 1, 2005     |
| 4. Plaintiff's designation of expert witnesses by:          | May 2, 2005       |
| 5. Defendant's designation of expert witnesses by:          | June 15, 2005     |
| 6. Expert depositions by:                                   | August 1, 2005    |
| 7. Dispositive Motions by:                                  | September 1, 2005 |
| 8. Final Pre-Trial Conference by:                           | December 1, 2005  |

- B. The parties have not yet determined whether they will consent to trial by magistrate judge.
- C. The plaintiff has presented a written settlement proposal to the defendant.
- D. The parties' certifications pursuant to Local Rule 16.1(D)(3) will be submitted.

Respectfully submitted,

The plaintiff,  
By his Attorneys,

KECHES & MALLIN, P.C.



SETH J. ELIN  
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DATED: October 28, 2004  
Certif-16.1D3

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above  
document was served upon the attorney(s)  
of record for each other party by mail/hand  
on 10/29/04.

